

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

AMERICAN COUNCIL OF THE BLIND OF
METROPOLITAN CHICAGO, ANN BRASH,
MAUREEN HENEGHAN, and RAY
CAMPBELL, on behalf of themselves and all
others similarly situated,

Plaintiffs,

UNITED STATES OF AMERICA,

Intervenor,

-against-

CITY OF CHICAGO

Defendant.

Case No. 1:19-cv-06322

Honorable LaShonda A. Hunt

**MOTION FOR RELIEF FROM GENERAL
ORDER 25-0024 AND TO RESET PLAINTIFFS' DEADLINE
TO FILE THEIR MOTION FOR ATTORNEYS' FEES AND COSTS (UNOPPOSED BY
DEFENDANT)**

Pursuant to General Order 25-0025, Plaintiffs American Council of the Blind of Metropolitan Chicago, Ann Brash, Maureen Heneghan, and Ray Campbell (collectively, "Plaintiffs"), through the undersigned counsel, hereby submit this Unopposed Motion for Relief from General Order 25-0024 and to Reset Plaintiffs' Deadline to File Their Motion for Attorneys' Fees and Costs (Unopposed by Defendant)¹.

In support thereof, Plaintiffs state as follows:

¹ Defendant City of Chicago does not oppose the relief sought in this motion. In light of the government shutdown, Plaintiffs have not been able to ascertain the position of the United States.

1. On May 29, 2025, the Court entered a Remedial Plan Order deeming Plaintiffs to be prevailing parties entitled to reasonable attorneys' fees, costs and expenses and authorizing Plaintiffs to move the Court for an award of such, should the Parties be unable to negotiate a mutually agreeable resolution. Dkt. 365.

2. Plaintiffs and Defendant have been unable to negotiate a mutually agreeable resolution and Plaintiffs seek to file a motion for fees and costs.

3. Plaintiffs and Defendant have regularly updated the Court as to the status of their negotiations and the Court has twice reset Plaintiffs' deadline to file a fee motion. Dkt. 371, 373, 374. Most recently, on September 26, 2025, the Court reset Plaintiffs' deadline to October 13, 2025. Dkt. 376.

4. On October 1, 2025, the Court entered General Order 25-0024, which *inter alia*, stayed all deadlines in cases where the United States is a party. Dkt. 377.

5. General Order 25-0025 authorizes any affected litigant to seek relief from the order and authorizes courts to vary the effect or operation of the General Order.

6. Pursuant to such authority, Plaintiffs seek relief from the stay issued by General Order 25-0024 and ask that the stay be lifted with respect to Plaintiffs' Motion for Attorneys' Fees and Costs.

7. The United States has no interest in Plaintiffs' Motion for Attorneys' Fees and Costs and thus, a stay is not necessary with respect to this motion. Only Plaintiffs were deemed prevailing parties entitled to fees in the Court's Remedial Plan Order, Dkt. 365, as the United States did not seek recognition as a prevailing party entitled to reasonable attorneys' fees, Dkt. 281.

8. In addition, the issue of the proper amount of attorneys' fees to be awarded to Plaintiffs' counsel is a dispute between Plaintiffs and Defendant. The United States has not been part of any of the ongoing negotiations between Plaintiffs and Defendant regarding Plaintiffs' fees, costs and expenses required by the Court's local rules, which began in June 2025, long before the current federal government shutdown.

9. An indefinite stay, however, would be prejudicial to Plaintiffs and Plaintiffs' counsel who have a strong interest in filing their fee petition so that the necessary briefing can commence without undue delay.

10. Should the Court agree to lift the stay, Plaintiffs ask the Court to reset Plaintiffs' deadline to file a motion to one week following the Court's order lifting the stay.

11. Defendant City of Chicago does not object to the relief requested in this motion.

Respectfully submitted,

For plaintiffs American Council of The Blind of Metropolitan Chicago, Ann Brash, Maureen Heneghan, and Ray Campbell

s/Rachel Weisberg

RACHEL WEISBERG
Disability Rights Advocates
300 South Wacker Drive, Floor 32
Chicago, IL 60606
Phone: (332) 217-2363
Fax: (212) 644-8636
Email: rweisberg@dralegal.org

MADELEINE REICHMAN
(admitted *pro hac vice*)
Disability Rights Advocates
655 Third Avenue, Suite 2619
New York, NY 10017
Phone: (332) 217-2318
Fax: (212) 644-8636
Email: mreichman@dralegal.org

NIGEL F. TELMAN
EDWARD C. YOUNG
RAMON ALVAREZ, JR.
Proskauer Rose LLP
70 West Madison
Suite 3800
Chicago, Illinois 60602
Phone: (312) 962-3550
Fax: (312) 962-3551
ntelman@proskauer.com
eyoung@proskauer.com
ralvarez@proskauer.com

CERTIFICATE OF SERVICE

I, Rachel M. Weisberg, one of the attorneys for Plaintiffs, hereby certify that on October 16, 2025, I caused a copy of the foregoing to be served electronically upon all the counsel of record via the Court's ECF System.

s/Rachel Weisberg